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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. 06-00685 SBA
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER CONTINUING DATE OF
v.)	CHANGE OF PLEA AND JUDGMENT
)	AND SENTENCING
OSCAR ROLDAN-MORAN)	
)	
Defendant.)	
_____)	
)	

It is hereby stipulated by and between the parties that the date scheduled for change of plea and Judgment and Sentencing in the above captioned case be continued to March 6, 2007 at 10:00 a.m. The reason for the requested continuance is that current counsel for the government will be out of town until February 20, 2007 and will not be able to finalize the plea agreement until that date; which will not allow counsel for the defense to timely file a sentencing memorandum. In addition, counsel for the government was only reassigned this case on Wednesday, February 7, 2007 and will need a little time to review the file. The parties further request that time be excluded under the Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv)

STIPULATION AND ORDER CONTINUING DATE OF CHANGE OF PLEA AND JUDGMENT AND SENTENCING

1 from the date of this Order to March 6, 2007 to allow for continuity and effective preparation of
2 government counsel.

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4 DATED: February 9, 2007

/s/

ALICIA W. FENRICK
Assistant United States Attorney

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6
7 DATED: February 9, 2007

/s/

JOYCE LEAVITT
Counsel for Defendant

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9 ORDER

10 GOOD CAUSE APPEARING, IT IS ORDERED that the change of plea and judgement and
11 sentencing date in the above captioned case be continued to March 6, 2007 at 10:00 a.m.. IT IS
12 FURTHER ORDERED that the time be excluded under the provisions of the Speedy Trial Act to
13 March 6, 2007 because the ends of justice served outweigh the best interest of the public and the
14 defendant in a speedy trial in order to allow for continuity and effective preparation of
15 government counsel under 18 U.S.C. §3161(h)(8)(A) and (B)(iv).
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18 DATED: February 12, 2007



SAUNDRA BROWN ARMSTRONG
United States District Judge

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STIPULATION AND ORDER CONTINUING DATE OF CHANGE OF PLEA AND
JUDGMENT AND SENTENCING